

January 5, 2007

**CERTIFIED MAIL 7005 0390 0006 0169 1731**

***Return Receipt Requested***

Mr. David Garrett  
RCRA Corrective Actions  
US EPA Region VII  
901 N. Fifth St.  
Kansas City, Kansas 66101

**RE: ASBESTOS SOLID WASTE MANAGEMENT UNIT (SWMU) CLOSURE DOCUMENT;  
OCCIDENTAL CHEMICAL CORPORATION, WICHITA PLANT RCRA ID# KSD007482029**

Dear Mr. Garrett:

The Wichita facility, currently owned by Occidental Chemicals Corporation began operations in the early 1950's as an Inorganic plant. An Asbestos Surface Impoundment was operated from 1951 to 1977. Asbestos containing waste generated during the regeneration of diaphragm cells that are used in the manufacture of sodium hydroxide were placed into this area located in the southern portion of the inorganic production area. The waste was transferred to the impoundment from the Waste Asbestos Handling area that is located within the Cell Repair building in the southern portion of the Facility. In 1977, the use of the impoundment was ceased and the area was capped with soil, concrete, and rock as warranted by construction of additional operational units in the area.

During routine maintenance activities near the Asbestos Surface Impoundment, asbestos was detected and controls were immediately put into place until a permanent corrective measure could be taken. The area was covered with tarps and plywood to prevent additional disturbance or exposure and minimal access was granted to the area. During November 2006, the Asbestos Surface Impoundment was capped with concrete as the attached drawings and construction proposal indicate.

Since 1977, the plant's asbestos waste has been disposed in licensed off-site facilities. Management controls are in place to prevent employee and contractor exposure to asbestos. Furthermore, the migration potential of the asbestos in the capped impoundment to the surrounding subsurface soil and groundwater is minimal therefore; investigation of this area will be deferred until Facility closure.

If you have any questions, please call me at 316/529-7204.

Sincerely,



Lisa R. Thurman  
Environmental Engineer

**RCAP RECEIVED**

**JAN 08 2007**

472752



RCRA RECORDS

c: Everett Spellman; KDHE

**CERTIFIED MAIL: 7005 0390 0006 0169 1748**

L0701012



**Occidental Chemical Corporation**





## CONSTRUCTION COST ESTIMATE

Prepared for: Swain Boyce  
Oxy Basic Chemical Company  
April 19, 2006

Re: Pave graveled area at E Cell & D Cell Cooling Tower # 4 for asbestos abatement

### Scope of work:

1. Prepare estimate
2. Asbestos awareness training
3. Notice to proceed from Environmental Department
4. Engineering and layout
5. Develop task analysis and schedule
6. Order and stage materials
7. Mobilization
8. Installation of visqueen barrier material between gravel and new concrete
9. Form, install, Install dowels to lock new curb at roadway to roadway paving, install reinforcing, concrete placement for new curb.
10. Form for high point of paving at E Cell.
11. Joint preparation at existing curbs
12. Forming and concrete placement for paving installation
13. Prepare and seal paving construction joints

### Construction cost summary

#### Labor:

- Construction work crew – foreman – four carpenters – two laborers – eight crew days X  
2,385.00 / crew day = 19,080.00
- Superintendent – 2,440.00

Total labor = 21,520.00

#### Equipment rental:

- Pick up trucks – 1,460.00
- Front end loader – 700.00

Total equipment rental = 2,160.00

#### Materials costs:

- Form lumber and fasteners – 472.00
- Form system rental charges – 350.00
- Expansion joint material – 114.00
- Visqueen underlayment – 700.00
- Water stop materials – 612.00
- Steel fiber reinforced concrete – 120 cubic yards @ 162.00 / cubic yard = 19,440.00
- Construction paving joint sealer – 480.00

Total materials cost = 22,168.00

GRAND TOTAL THIS ESTIMATE \_\_\_\_\_ 45,848.00

  
Bob Proctor  
Utility Contractors Inc

GLENDSPRINGS HOLDINGS PAYMENT \$19,000  
WICHITA PLANT \$26,848



## CONSTRUCTION COST ESTIMATE

Prepared for: Swain Boyce  
Oxy Basic Chemical Company  
April 19, 2006

Re: Pave graveled area at C Cell & B Cell Cooling Tower # 4 for asbestos abatement

### Scope of work:

1. Prepare estimate
2. Asbestos awareness training
3. Notice to proceed from Environmental Department
4. Engineering and layout
5. Develop task analysis and schedule
6. Order and stage materials
7. Mobilization
8. Remove ballast and tarps
9. Installation of visqueen barrier material between gravel and new concrete
10. Joint preparation at tie to existing curbs
11. Form, install expansion joint material
12. Construct curb and ramp at street
13. Concrete placement for paving installation
14. Prepare and seal paving construction joints

### Construction cost summary

#### Labor:

- Construction work crew – foreman – two carpenters – laborer – fourteen crew days X  
1,251.00 / crew day = 17,514.00
- Superintendent – 2,300.00

Total labor = 19,814.00

#### Equipment rental:

- Pick up trucks – 1,600.00
- Front end loader - 760.00

Total equipment rental = 2,360.00

#### Materials costs:

- Form lumber and fasteners – 472.00
- Expansion joint material – 114.00
- Water stop material – 312.00
- Visqueen underlayment – 700.00
- Steel fiber reinforced concrete – sixty two cubic yards @ 162.00 / cubic yard = 10,044.00
- Construction paving joint sealer – 480.00

Total materials cost = 12,122.00

GRAND TOTAL THIS ESTIMATE \_\_\_\_\_ 34,296.00

  
Bob Proctor  
Utility Contractors Inc



## CONSTRUCTION COST ESTIMATE

Prepared for: Swain Boyce  
Oxy Basic Chemical Company  
December 15, 2006

Re: Construct access ramp for # 4 Cooling Tower paving.

**Scope of work:**

1. Prepare and submit estimate
2. Remove gravel fill from storm water drainage flume where ramp is to be built
3. Remove section of existing drainage flume at east side of new ramp
4. Fabricate and install half pipe for storm water pass through on underside of new ramp
5. Reinforcing installation and concrete placement for new ramp

**Construction cost summary**

**Labor:**

- Construction work crew – foreman – carpenter – laborer – ten crew hours at 115.00 / crew hour = 1,150.00
- Superintendent – 150.00

Total labor = 1,300.00

**Equipment rental:**

- Pick up trucks – 85.00
- Air compressor and jackhammers – 120.00
- Front end loader – 110.00

Total equipment rental = 315.00

**Materials costs:**

- 10" PVC pipe – 96.00
- Reinforcing – 57.00
- Concrete – 328.00

Total materials cost = 481.00

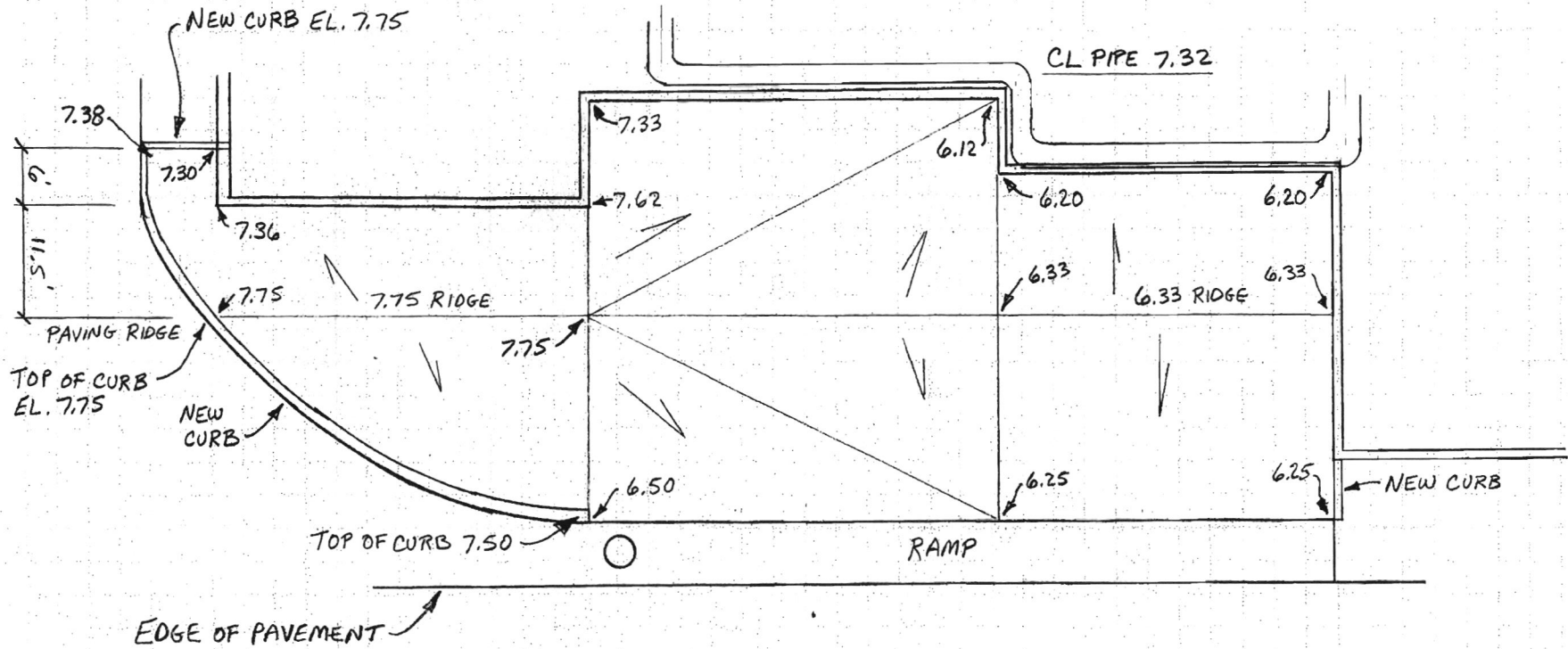
**GRAND TOTAL THIS ESTIMATE ——— 2,096.00**

Bob Proctor  
Utility Contractors Inc.



National Brand

42-381 50 SHEETS EYE-EASE 5 SQUARE  
42-382 100 SHEETS EYE-EASE 5 SQUARE  
42-389 200 SHEETS EYE-EASE 5 SQUARE



TOP OF CONCRETE ELEVATIONS - NEW PAVING

CONCRETE MIX TO BE 4000 PSI W/ 50 LBS / CUBIC  
YARD NOVOCON 1050 HE STEEL FIBERS, FINISH SURFACE  
TO COVER FIBERS.

OXYCHEM

CT 4 PAVING

DEC  
5N

APRIL 06  
1 of 8



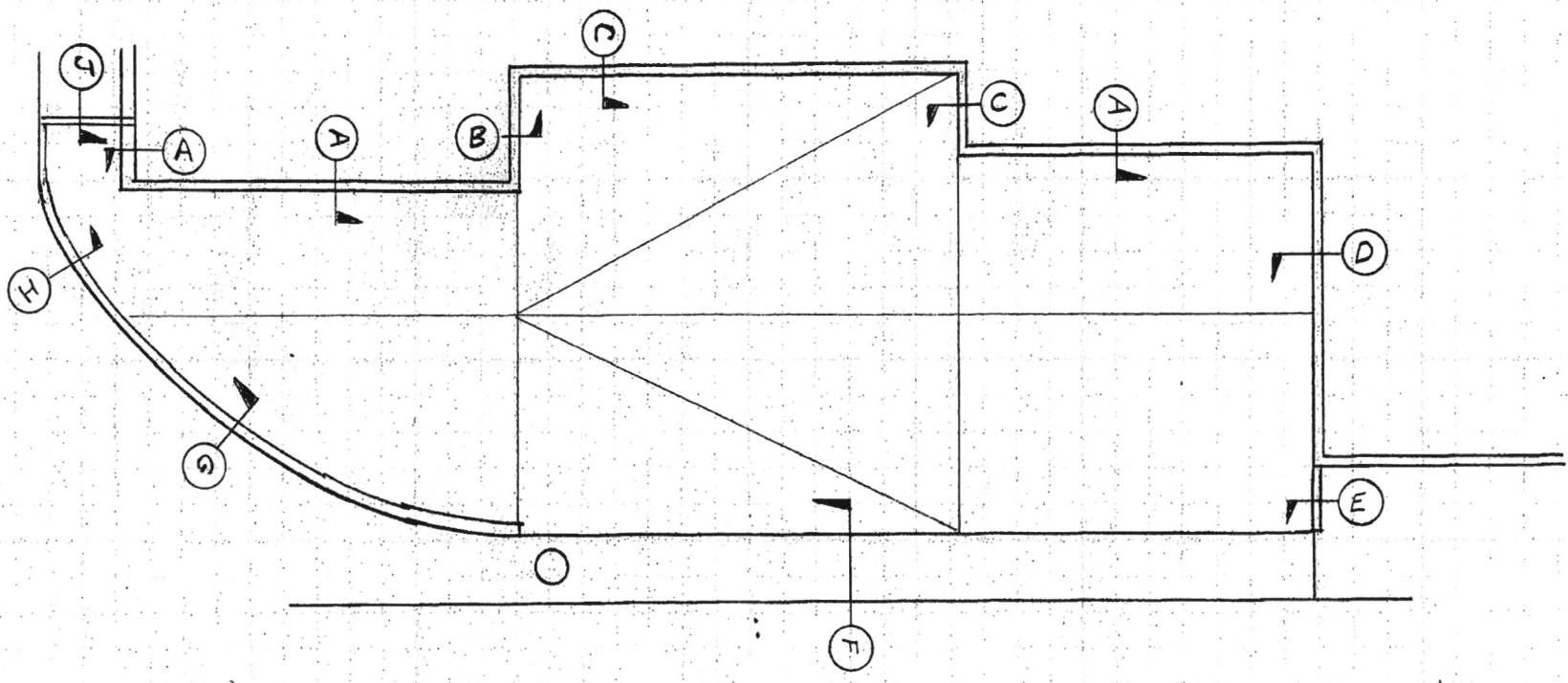
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42-302 100 SHEETS EYE-BASE 5 SQUARE  
42-303 200 SHEETS EYE-BASE 5 SQUARE

OXYCHEM

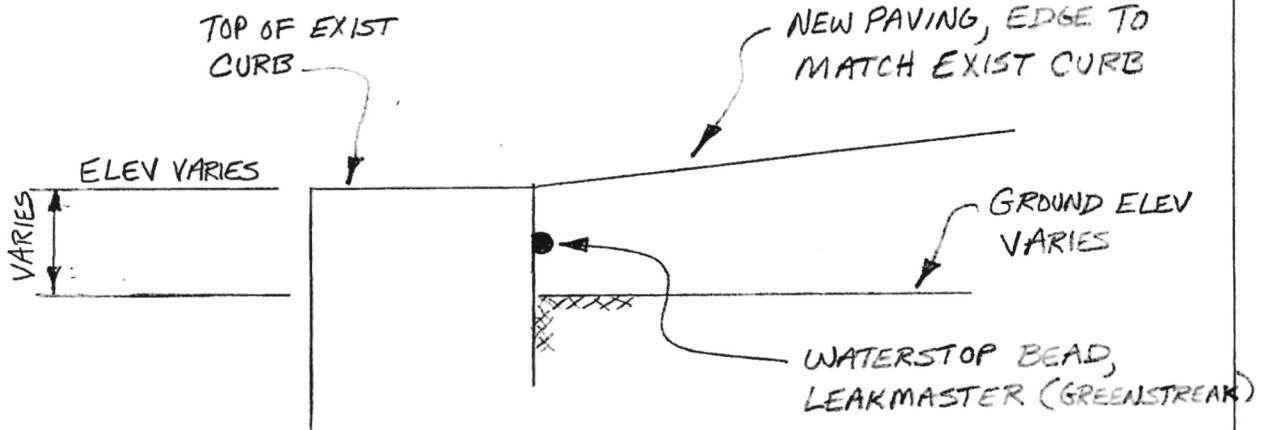
CT 4 PAVING

SN<sup>C</sup>

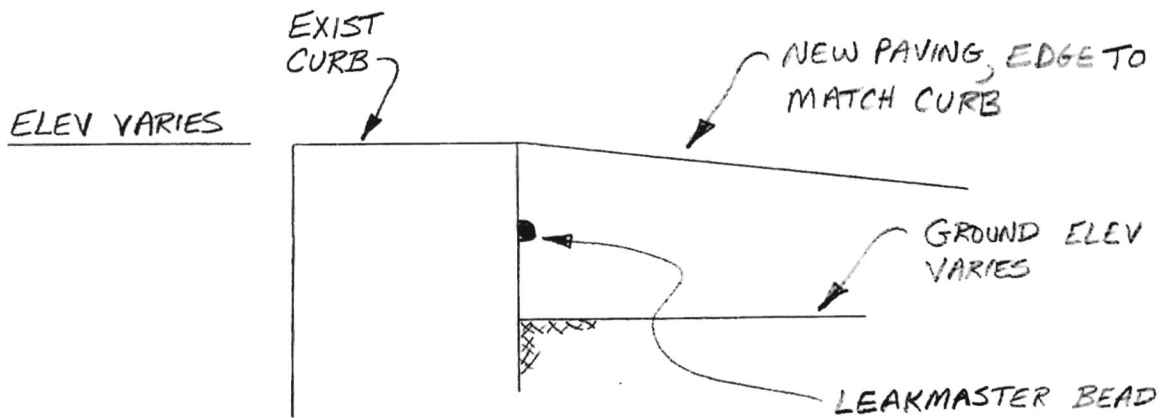
April 06  
2 of 8



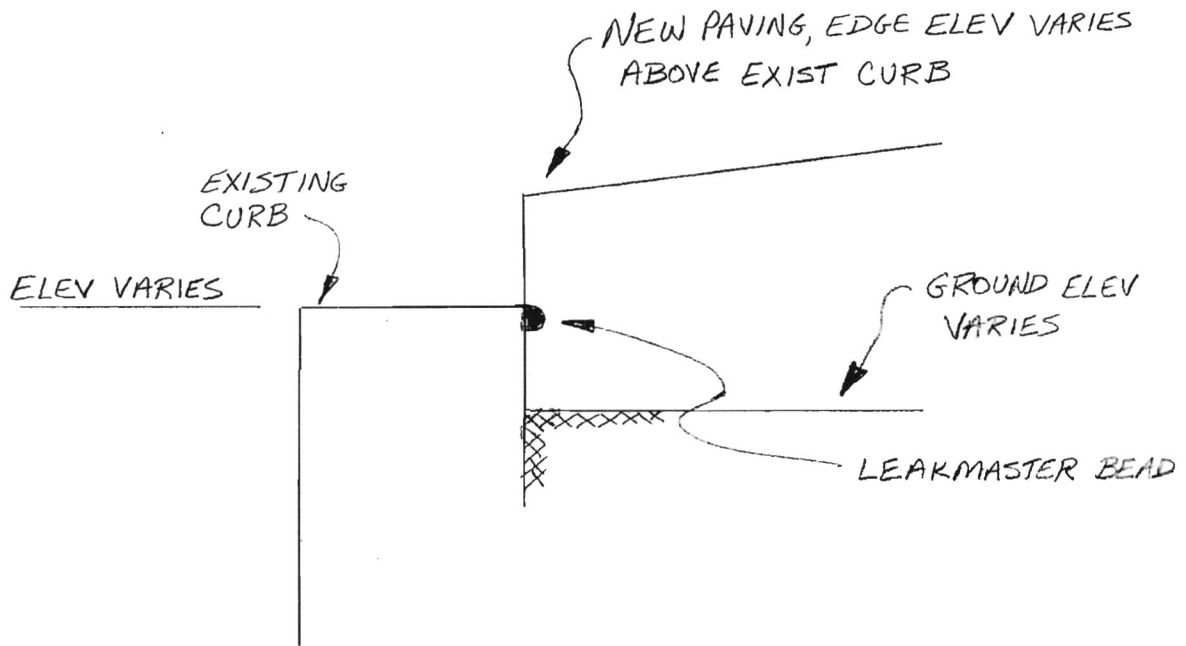




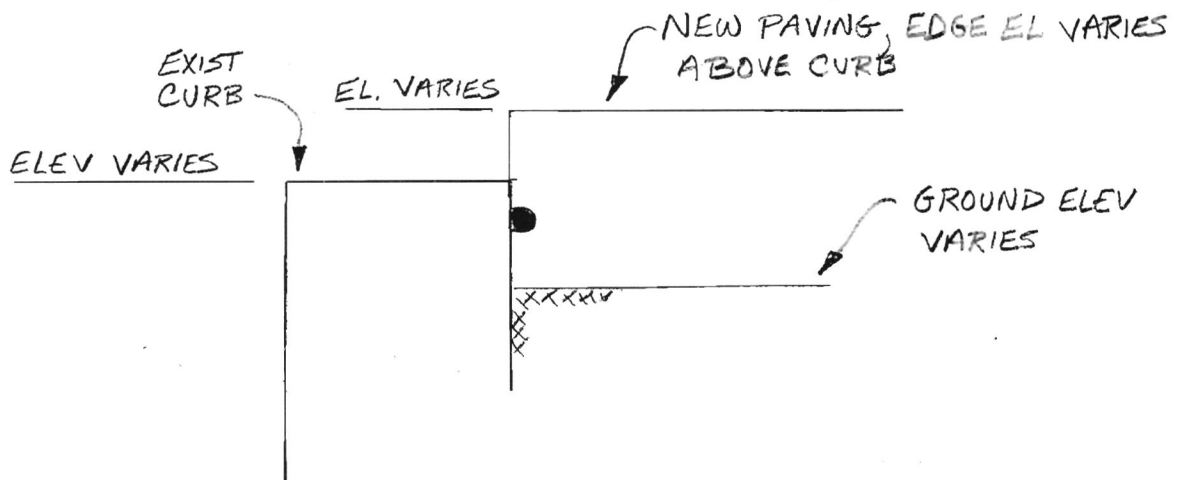
SECTION A



SECTION B



SECTION C



SECTION D



OxyChem

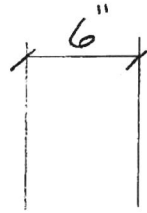
CT 4 PAVING

SEC  
SN

APRIL 06

5 of 8

NEW CURB  
EL. VARIES



NEW PAVING

#3x6", 18" c/c

GROUND ELEV VARIES

#3x8" EMBED  
@ 18" c/c

SECTION E

EDGE OF ROAD

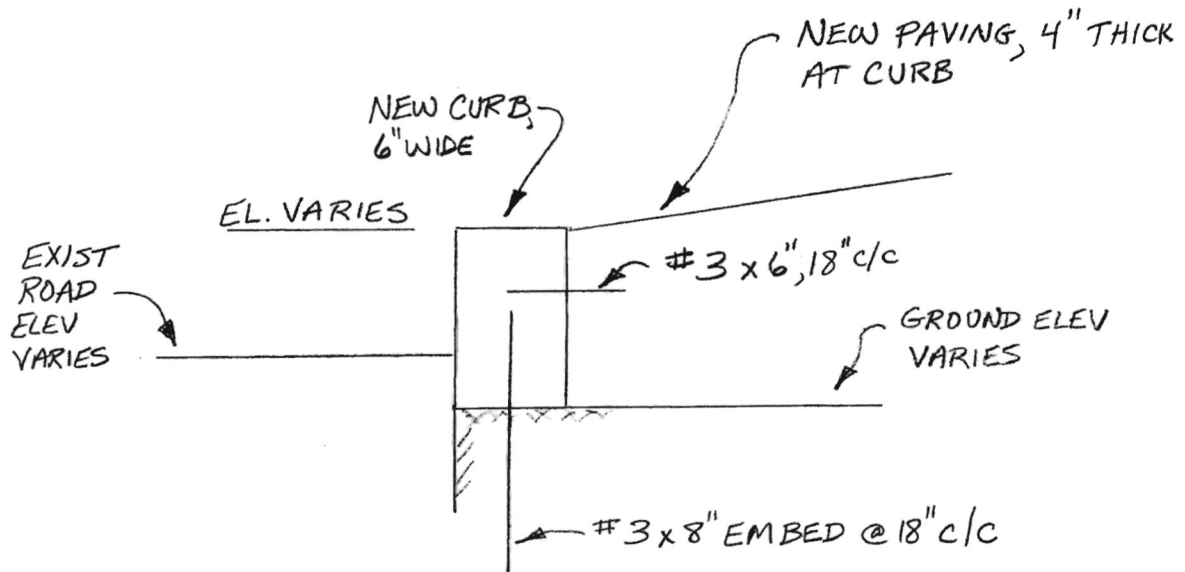
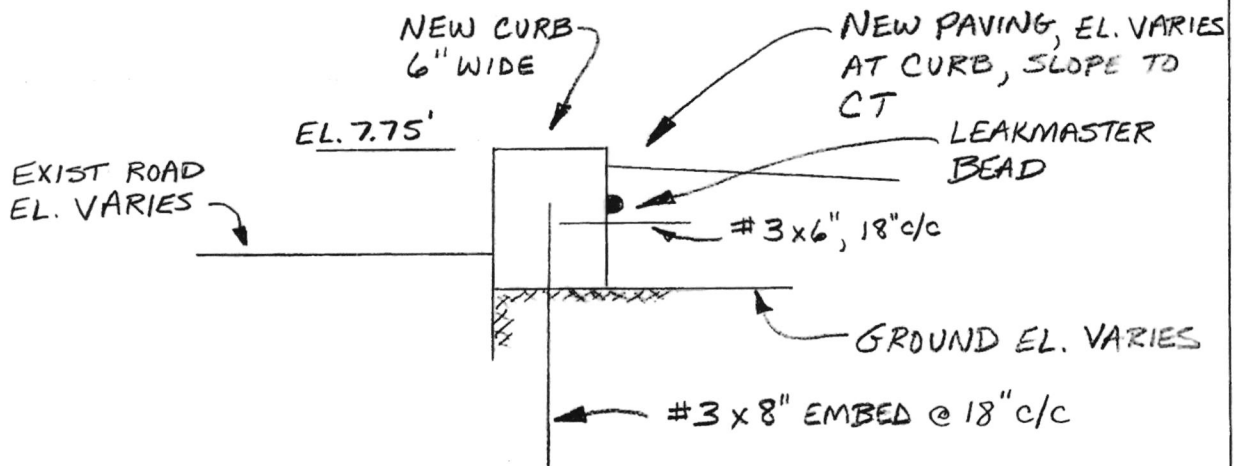
RAMP

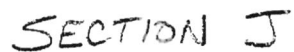
EL. VARIES

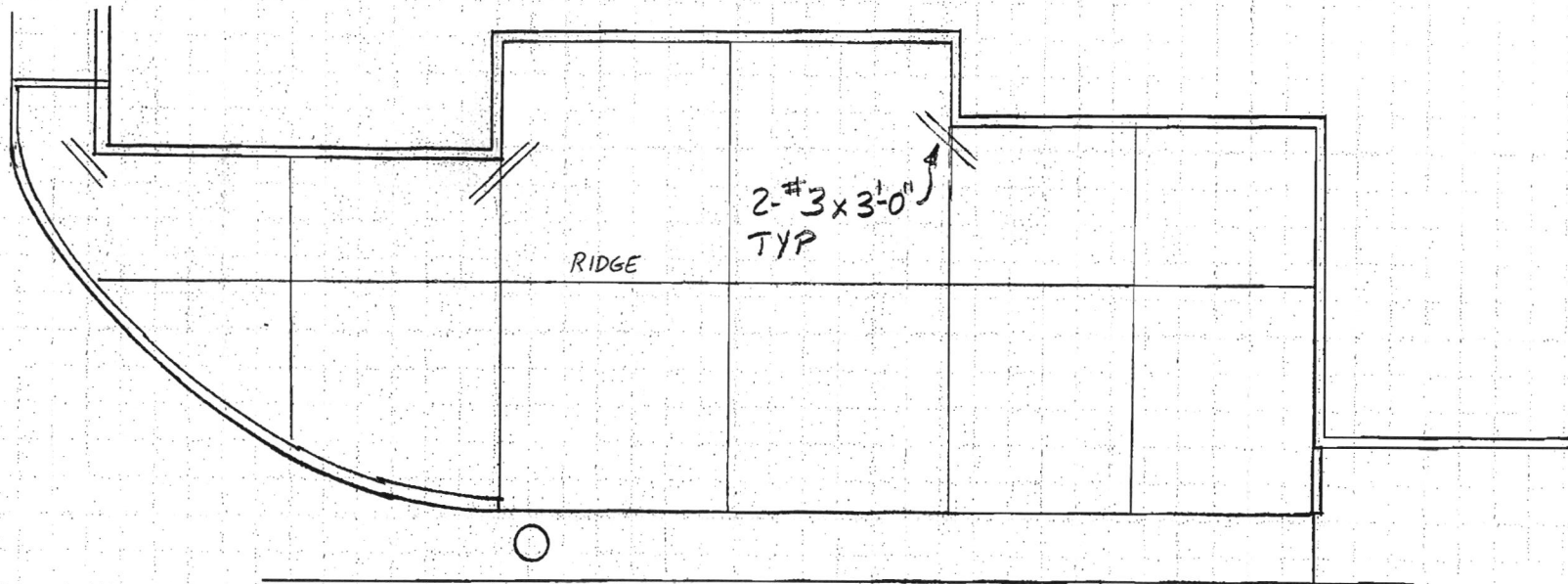
NEW PAVING,  
EDGE TO MATCH  
RAMP

GROUND ELEV  
VARIES

SECTION F

SECTION GSECTION H





CONTROL JOINT PLAN

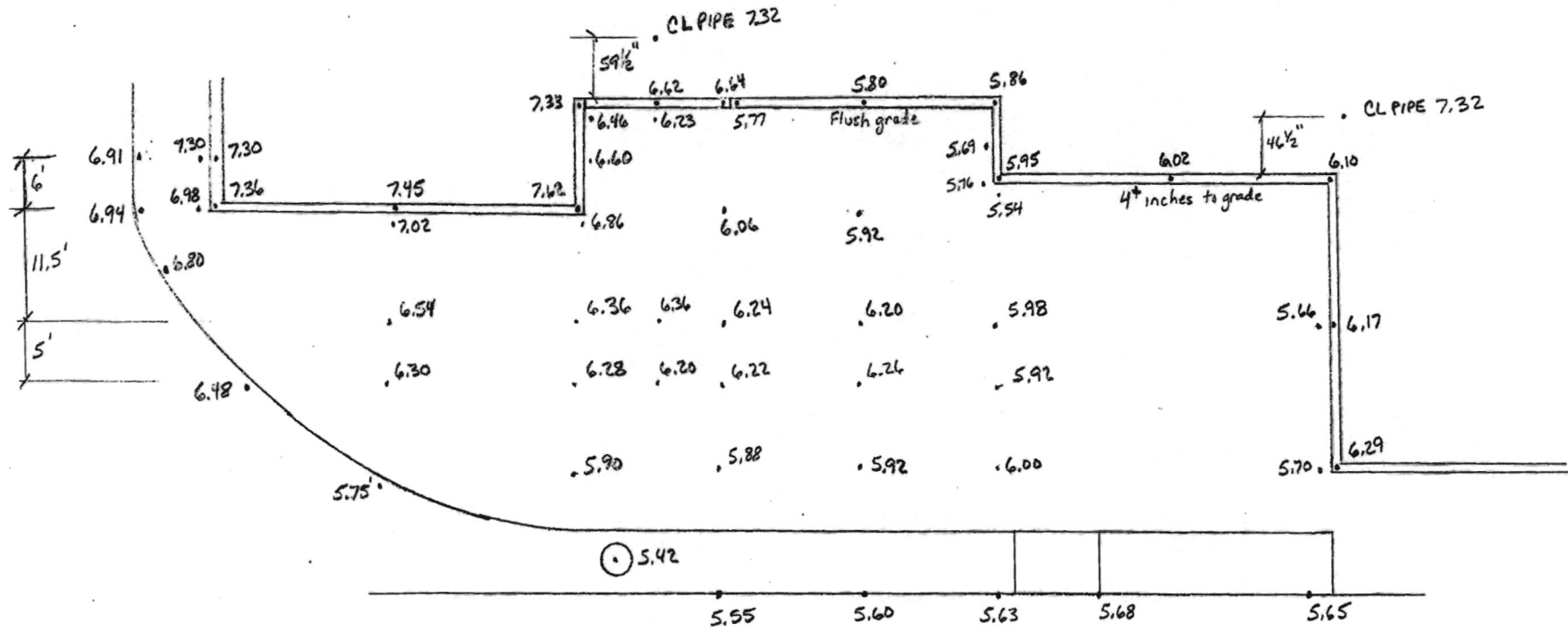
1. SAW CUT JOINTS  $\frac{1}{4} \times \frac{1}{2}$  DEEP, CAULK FILLED
2. CORNER REINF TO BE TWO #3 LOCATED 3" + 9" FROM CORNER, 3 PLCS  
 $1\frac{1}{2}$ " BELOW SURFACE

Oxy Chem

CT 4 PAVING

JEC  
SN

APRIL 06  
2008



EXISTING ELEVATIONS - PLAN

Oxy Chem

CT 4 PAVING

SEC

APRIL 06  
1 of 1